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October 15, 2013

Ms. Jan Palumbo (AWT-121)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: October 2013 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the October 2013 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from September 15, 2013, to October 15, 2013.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On September 19, 2013, Baxter initiated field activities related to the Revised Source Area Investigation and Chemical Oxidation Pilot Test Work Plan (Pork Plan). Field work included installation of four soil boreholes in the Main Treating Area using roto-sonic drilling equipment; and collection of groundwater samples from five on-site wells. All field work was completed by September 21, 2013.
- The following samples were collected from the soil borehole and on-site wells and submitted for laboratory analysis in accordance with the EPA-approved Work Plan:
 - Six soil samples and one groundwater sample were provided to Ursus Remediation Testing and Technologies of Mt. Horeb, Wisconsin for total oxidant demand and treatability testing.
 - Seven soil samples (including one duplicate) were submitted to ALS Laboratories in Kelso, Washington, for organic and general chemistry analysis.
 - Four soil samples were submitted to Microbial Insights of Knoxville, Tennessee, for DNA testing.

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- Six groundwater samples (including a duplicate and equipment rinsate) were submitted to ALS Laboratories in Kelso, Washington, for organic and general chemistry analysis.
- The Remedial Action Pilot System continued to operate during the reporting period.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter plans to evaluate soil and groundwater data generated from the Source Area Investigation as it is received.
- Baxter will continue to operate the Pilot Study remediation system during the next reporting period.

OTHER INFORMATION

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

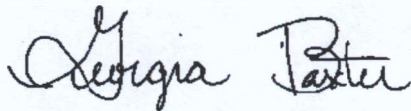
- Baxter has no other information to report.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



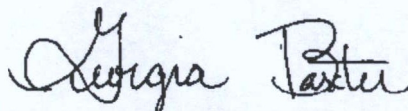
Signature:



Name: Georgia Baxter
Title: Chief Executive Officer
Date: October 15, 2013

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group
J. Stephen Barnett, AMEC